

# SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

3000 K STREET, NW, SUITE 300

WASHINGTON, DC 20007-5116

TELEPHONE (202) 424-7500

FACSIMILE (202) 424-7645

WWW.SWIDLAW.COM

June 22, 1999

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ANANDASHANKAR MAZUMDAR  
DIRECT DIAL (202) 945-6929  
AMAZUMDAR@SWIDLAW.COM

NEW YORK OFFICE  
919 THIRD AVENUE  
NEW YORK, NY 10022-9998  
(212) 758-9500 FAX (212) 758-9526

## VIA HAND DELIVERY

Magalie Roman Salas  
Commission Secretary  
Federal Communications Commission  
Portals II  
445 12th St., N.W.  
Suite TW-A325  
Washington, D.C. 20554

**RECEIVED**

**JUN 22 1999**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

Re: Choice One Communications of Rhode Island Inc. IntraLATA Toll Dialing Parity  
Implementation Plan for Rhode Island, File No. NSD-L-98-121, CC Docket 96-98

Dear Ms. Salas:

Enclosed for filing with the Federal Communications Commission ("Commission") are an original and four (4) copies of the IntraLATA Toll Dialing Parity Implementation Plan for the State of Rhode Island and Providence Plantations ("Plan") of Choice One Communications of Rhode Island Inc. ("Choice One"). Pursuant to the Commission's June 18, 1999 Public Notice, Choice One is sending two additional copies of the Plan to Mr. Al McCloud of the Commission's Network Services Division.

The Rhode Island Public Utilities Commission (RIPUC) has taken no action on the Plan, filed with the RIPUC on April 21, 1999. Choice One, therefore, files its Plan in order to conform with the Commission's Order, released on March 23, 1999, directing local exchange carriers ("LECs") to file their plans with the Commission on June 22, 1999, if "a state commission has not yet acted on a LEC's intraLATA toll dialing parity implementation plan."<sup>1</sup>

No. of Copies rec'd 0+4  
List A B C D E

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<sup>1</sup> Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, and Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, Order, CC Docket 96-98, NSD File No. L-98-121, FCC 99-54 (rel. March 23, 1999).

Magalie Roman Salas  
June 22, 1999  
Page 2

Thank you for your attention to this matter. Please date-stamp the enclosed extra copy of this filing and return it in the attached postage-paid envelope. Should you have any questions, please do not hesitate to contact Anandashankar Mazumdar at (202) 945-6929.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dana Frix".

Dana Frix  
Kemal M. Hawa

Counsel for Choice One Communications of Rhode  
Island Inc.

Enclosure

cc: Al McCloud (NSD/2 copies)  
Kim Robert Scovill, Esq.  
George Huber  
Anandashankar Mazumdar

**CHOICE ONE  
INTRALATA TOLL DIALING PARITY PLAN**

**INTRODUCTION**

Choice One has implemented the following processes which are designed to give end-user customers the opportunity to designate a carrier for their intraLATA toll call traffic in those market areas where Choice One is a facilities-based local exchange service provider. IntraLATA toll calls will automatically be directed to the designated carrier without the customer having to dial an access code.

**POLICIES**

Choice One will deploy two-PIC (Primary Interexchange Carrier) technology in its switches enabling customers to prescribe to either the same or two different carrier(s) for their intraLATA and interLATA services.

Appropriate tariffs will be revised and filed in accordance with this plan, and applicable rules and regulations.

Choice One will offer customers the ability to access all participating carriers by dialing the appropriate access codes (10XXX/101XXXX).

All eligible Choice One end user telephone line numbers will be prescribed and have two PICs associated with them.

**CARRIER INFORMATION**

Interexchange carriers will have the option of offering intraLATA service only or intraLATA and interLATA service.

Interexchange carriers will have the option of participating in all market areas or in a specific market area.

Interexchange carriers will be required to return a completed Non-Disclosure Agreement and Participation Agreement(s).

Choice One will not participate in billing disputes for intraLATA service between an alternative competing interexchange carrier and its customers.

Choice One representatives will not initiate or accept three-way calls from an alternative interexchange carriers in order to discuss pre-subscription.

Carriers wishing to participate will be requested to submit Access Service Requests/Translation Questionnaires to the Access Tandem owner and to Choice One.

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## CALL ELIGIBILITY/TOLL DIALING PLAN

All local service customers of Choice One will have calls routed according to the following plan:

If a Choice One Customer Dials:	The Call is Handled By/Routed To:
911	PSAP on originating line number
411/555-1212	Directory Assistance Operator
0-	Operator
7 digits (local call)	Local Exchange Carrier
7 digits (IntraLATA toll call, same NPA)	IntraLATA Toll Provider
1 + 10 digits (IntraLATA toll call)	IntraLATA Toll Provider
0 + 10 digits (IntraLATA toll call)	IntraLATA Toll Provider
1 + 10 digits (InterLATA toll call)	InterLATA Toll Provider
0 + 10 digits (InterLATA toll call)	InterLATA Toll Provider
10XXX or 101XXXX + 0-	XXX/XXXX Carrier
10XXX or 101XXXX + 7 digits (IntraLATA toll)	XXX/XXXX Carrier
10XXX or 101XXXX + 0+10 digits	XXX/XXXX Carrier
10XXX or 101XXXX+10 digits	XXX/XXXX Carrier

If a Choice One customer originates a call to an alternative interexchange carrier's Operator by dialing 00-, the call will be routed to the PIC on that customer's line. If the customer originates a call to an alternative interexchange carrier's Operator by dialing an access code (e.g., 10XXX/101XXXX + 0-), the call will be routed to the XXX/XXXX carrier. In both cases, the carrier's switch is responsible for routing this call to the alternative interexchange carrier's Operator or to an announcement.

## NETWORK INFORMATION

All originating intraLATA traffic will initially be routed via the incumbent Local Exchange Carrier (LEC) Access Tandem(s). Following conversion, direct trunks between the Choice One switch and the interexchange carrier location(s) may be provided when warranted by traffic volume.

Interexchange carriers must have Feature Group D trunks in place (or ordered) between their point of presence and the incumbent LEC Access Tandem(s).

Choice One will route all originating intraLATA traffic to the designated carrier and will only block traffic at the request of the end user customer and/or in compliance with regulatory requirements. Requests from carriers to block traffic or to remove customers from their network will not be honored. Calls that cannot be completed to a carrier will be routed to an announcement.

## **CUSTOMER CONTACT INFORMATION**

Choice One customer contact representatives will process customer initiated PIC selections to Choice One or to an alternative intraLATA carrier. Carriers will have the option of allowing the Choice One representative to process PIC requests on their behalf.

Choice One will not ballot or allocate its customer base. At the time of conversion, all customers will be "PIC'd" to Choice One unless another carrier is chosen by the particular customer.

Choice One customer contact representatives will respond to customer inquiries about intraLATA carriers in a competitively neutral fashion. If a customer requests information on alternative carriers other than Choice One, a list of participating carriers will be read to that customer in random order by Choice One representatives.

If the intraLATA toll carrier selected by the customer permits Choice One to process orders on its behalf, Choice One will accept the PIC change request. If the customer selects an intraLATA toll carrier that does not allow Choice One to process PIC changes on its behalf, Choice One will provide the customer with the carrier's toll-free number (if provided by the carrier).

Choice One representatives will not discuss alternative carrier rates or services and will not provide customers with Carrier Identification Codes or access code dialing instructions.

## **PRE-SUBSCRIPTION INFORMATION**

Consistent with the tariffs of Choice One, a PIC change charge may be incurred and billed to a Choice One customer for each eligible line where a PIC change is made. Choice One will offer its customers a 90-day grace period following the implementation of this plan during which the customers may change intraLATA carriers without incurring a PIC change charge. Customers can make multiple PIC changes during these 90 days at no charge. After the 90-day period, Choice One may assess the PIC change charge for each PIC change made. Choice One will offer interexchange carriers the option of having the PIC charge billed to the carrier or directly to the customer.

New line customers, including customers adding lines, will have the opportunity to select a participating carrier, or they will be assigned a NO PIC designation. If a customer cannot decide upon an intraLATA carrier at the time of order, Choice One may extend a 30-day period following placement of the customer's service order for the customer to select an intraLATA carrier without charge. Such a customer will be assigned a NO PIC designation in the interim. After this 30-day period, Choice One will assess the PIC change charge as described above. Customers assigned a NO PIC designation as set forth in this paragraph will be required to dial an access code to reach an intraLATA carrier's network.

If a Choice One customer denies requesting a change in intraLATA toll providers as submitted by an intraLATA carrier, and the intraLATA carrier is unable to produce a Letter of Agency signed by the customer or some other form of verification that is permitted by law, the intraLATA carrier will be assessed a charge for the unauthorized PIC change and the PIC will be changed as per the

customer's request. This penalty is in addition to any other penalties authorized by law.

Alternative interexchange carriers may submit PIC changes to Choice One via a fax/paper interface.

Choice One will process intraLATA PIC selections in the same manner and under the same intervals of time as interLATA PIC changes.

Carriers will be required to submit PIC changes via paper. Choice One will provide carriers with PIC order confirmation and reject information. Specific details regarding this process will be provided to participating carriers.

For customers who change their local service provider from the incumbent LEC to Choice One and retain their incumbent LEC telephone number(s), Choice One, as part of this process, will provide the selected intraLATA carrier with both the retained (incumbent LEC) telephone number and the Choice One telephone number.

Dated: April 21, 1999